

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION, YOUNGSTOWN**

**AYSIA CANTERBURY & LISA
SODERGEN, individually, and on behalf
of all others similarly situated,**

Plaintiffs,

v.

**NORFOLK SOUTHERN
CORPORATION, NORFOLK
SOUTHERN RAILWAY COMPANY**

Defendants.

Case No.: 4:23-cv-00298-BYP

**PLAINTIFF'S MOTION FOR PRO HAC VICE ADMISSION
ON BEHALF OF RENE ROCHA**

Pursuant to Local Civil Rule 83.5 of the United States District Court for the Northern District of Ohio, Rene F. Rocha, attorney for Plaintiffs Aysia Canterbury and Lisa Sodergen, individually, and on behalf of all others similarly situated ("Plaintiffs"), respectfully moves this Court for an Order permitting him to appear *pro hac vice* and to participate in the above-captioned matter, and further states:

1. Mr. Rocha is a non-resident attorney who does not make frequent or regular appearances in separate cases so as to constitute the maintenance of a regular practice of law in the State of Ohio and has concurrently submitted a Certificate of Good Standing. (See Exhibit "A").
2. Mr. Rocha is an attorney and a member of the law firm of Morgan & Morgan, P.A., with offices at 400 Poydras Street, Suite 1515, New Orleans, LA 70130; P: (504) 636-6310, F: (504) 636-6301. Mr. Rocha's electronic mail address is rrocha@forthepeople.com.

3. Mr. Rocha and other attorneys in the above-named law firm serve as counsel for the Plaintiffs and have been retained personally or as a member of the above-named law firm by Plaintiffs to provide legal representation in connection with the above-styled matter now pending before the above-named court of the Northern District of Ohio.

4. Mr. Rocha is an active member in good standing currently eligible to practice law in the following jurisdictions:

- State of Louisiana,
 - LA Bar No. 34411
 - Date admitted: 9/27/2012
- United States District Court for Eastern District of Louisiana
- United States District Court for Western District of Louisiana

5. There are no disciplinary proceedings pending against Mr. Rocha in any state or federal court.

6. Within the past five (5) years, Mr. Rocha has not been subject to any disciplinary proceedings in any state or federal court.

7. Mr. Rocha has agreed to be familiar with and be bound by the Local Rules for the Northern District of Ohio, the Rules of Professional Conduct, and other requirements governing the professional behavior of members of the Ohio Bar.

8. Mr. Rocha will comply with the requirements of Local Civil Rule 83.5.

9. Mr. Rocha will register for CM/ECF and obtain a password within twenty (20) days of an order granting this Motion.

10. Mr. Rocha has concurrently sent a Certificate of Good Standing and the application fee to the Attorney Admissions Clerk, United States Northern District Court.

WHEREFORE, Rene F. Rocha respectfully requests this Honorable Court enter an Order granting pro hac vice admission and designating Rene F. Rocha, Esquire as additional counsel for Plaintiffs and added to the service of all future papers served in this matter.

Dated this 9th day of March, 2023.

Respectfully submitted,

/s/Jesse A. Shore
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*Attorneys for the Plaintiff and
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**Pro Hac Vice Pending*

CERTIFICATE OF SERVICE

The undersigned hereby certify that the foregoing has been filed electronically on this 9th day of March, 2023 with the Clerk of Court by using the CM/ECF system which will send a notice of this electronic filing to counsel of record.

s/s/Jesse A. Shore

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